To: Beeler, Cindy[Beeler.Cindy@epa.gov]

From: Ostendorf, Jody

**Sent:** Thur 8/4/2016 8:20:38 PM

Subject: FW: question

These are the numbers I was talking about ...

Jody Ostendorf

State Implementation Plan Program Manager

**Uinta Basin Project Coordinator** 

Air Quality Planning Unit (8P-AR)

U.S. Environmental Protection Agency, Region 8

1595 Wynkoop Street

Denver, CO 80202-1129

303.312.7814

From: Smith, Claudia

**Sent:** Thursday, August 04, 2016 1:31 PM **To:** Ostendorf, Jody <ostendorf.jody@epa.gov>

Subject: RE: question

We have 2 numbers that we used in the draft proposal. 5,169 for existing U&O sources that would be subject to at least some requirements (auto-igniter, submerged fill truck loading/unloading, low-bleed pneumatics), and 3,410 of those sources that are greater than or equal to 5 tpy VOC and would also be subject to the requirements to control emissions from tanks/dehys/pumps and/or LDAR (3,017 for everything and the remaining for just LDAR). It seems like the 5,169 would be the Indian country counter number to UDEQ's 1,803 sources. It seems like the 3,410 would be the Indian country counter number to UDEQ's 1,561 sources (greater than 5 tpy). We can offer to add mention of the counts of UDEQ sources in the NPRM and RIA.

Thanks,

#### Claudia

From: Ostendorf, Jody

**Sent:** Thursday, August 04, 2016 12:15 PM **To:** Smith, Claudia <a href="mailto:Smith.Claudia@epa.gov">Smith.Claudia@epa.gov</a>>

Subject: RE: question

So Claudia, which number do we put in the answer for the Q&A?

Jody Ostendorf

State Implementation Plan Program Manager

Uinta Basin Project Coordinator

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From: Smith, Claudia

**Sent:** Thursday, August 04, 2016 11:50 AM **To:** Whitney Oswald <a href="mailto:sweathagov">woswald@utah.gov</a>>

Cc: Sheila Vance <svance@utah.gov>; Ostendorf, Jody <ostendorf.jody@epa.gov>

Subject: RE: question

This is exactly what we need, thank you!

Thanks,

#### Claudia

From: Whitney Oswald [mailto:woswald@utah.gov] Sent: Thursday, August 04, 2016 11:46 AM To: Smith, Claudia <Smith.Claudia@epa.gov> Cc: Sheila Vance <svance@utah.gov>; Ostendorf, Jody <ostendorf.jody@epa.gov> Subject: Re: question In the 2014 O&G EI we had 1,803 reported facilities on state jurisdiction. Of these facilities, according to the emissions reported, we have 1,561 that were over the 5 TPY threshold and 242 below. Whitney On Thu, Aug 4, 2016 at 11:15 AM, Smith, Claudia < Smith. Claudia@epa.gov > wrote: Thank you both. What we are looking for, if it is possible, is an estimate of the number of existing oil and natural gas "sources" in the Uinta Basin that either have received, or should have received, a minor source permit from UDAQ (VOC PTE greater than or equal to 5 tpy), so that we can compare that to the number of existing sources on Indian country lands within the Uintah and Ouray Indian Reservation in the Uinta Basin that we estimate would be subject to the proposed FIP for existing oil and natural gas sources that we are developing. We anticipate such sources include well pads/well sites, compressor stations, natural gas processing plants, etc. Thanks, Claudia

From: Whitney Oswald [mailto:woswald@utah.gov]

**Sent:** Thursday, August 04, 2016 9:57 AM **To:** Sheila Vance <svance@utah.gov>

**Cc:** Smith, Claudia < Smith.Claudia@epa.gov >; Ostendorf, Jody

<ostendorf.jody@epa.gov>
Subject: Re: question

Each individual well would have it's own unique API #, so you can have instance where you have multiple wells (API #'s) on a single well pad. You can also run into instances where you have a single API # but the well is producing from several different production zones, this usually occurs after a recompletion. I am not aware of any indicators that we have available to us that notes whether a well is located on a multiple well pad. In our new emissions inventory, which is reported on a facility basis, we are asking which API #'s are associated with each reported facility. So if they are reporting a tank battery for instance, we would be able to get a rough idea of which wells are flowing to that battery and how much production is going there. However those same API #'s could be associated with multiple facilities. For instance if they also produce gas and that gas flows to a dehydrator which may be located elsewhere and considered a different facility.

Hopefully this answers your question. Otherwise let me know.
Thanks,
Whitney
On Thu, Aug 4, 2016 at 9:23 AM, Sheila Vance < <u>svance@utah.gov</u> > wrote:
Okay - I am going to include Whitney Oswald on this conversation as I probably should have about two iterations ago! She is the real answer lady for this and I have just been the go-between! I may not have understood this right so Whitney maybe you can go through this email chain and help me out? Thanks!!
Sheila

On Thu, Aug 4, 2016 at 8:33 AM, Smith, Claudia < Smith. Claudia@epa.gov > wrote:

We consider the pads, with one or multiple wells one source as well, and have also always had trouble matching the API numbers to well pads. We are glad that our new source FIP, effective in October of this year has a registration form that asks for all of the US Well ID numbers associated with each source, but that does not help us for existing sources.

When you say the API number would be equivalent to one source, I'm not following. I thought API numbers were assigned to individual wells, so what if there is a multi-well pad? Would there not be multiple API numbers associated with that pad?

Thanks,

Claudia

From: Sheila Vance [mailto:svance@utah.gov]
Sent: Wednesday, August 03, 2016 6:03 PM
To: Smith, Claudia < Smith.Claudia@epa.gov >
Cc: Ostendorf, Jody < ostendorf.jody@epa.gov >

Subject: Re: question

Claudia - these are based upon API number, so it could be one well or a pad of wells. But this would make the number be equivalent to one source, as a pad with multiple wells would be one source if permitted - does that make sense? We have a real difficulty in trying to match API numbers to permits - which is why we really need an oil and gas registration! Anyway, hope this helps. Thanks!

Sheila

On Wed, Aug 3, 2016 at 4:01 PM, Smith, Claudia < Smith.Claudia@epa.gov > wrote:

Thanks, Sheila. The numbers correspond to individual wells, or production well sites?

Thanks,

Claudia

From: Ostendorf, Jody

**Sent:** Wednesday, August 03, 2016 3:40 PM **To:** Sheila Vance <<u>svance@utah.gov</u>>

Cc: Smith, Claudia < Smith.Claudia@epa.gov>

Subject: RE: question

Thank you Sheila!

Jody Ostendorf

State Implementation Plan Program Manager

Uinta Basin Project Coordinator

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From: Sheila Vance [mailto:svance@utah.gov]
Sent: Wednesday, August 03, 2016 3:33 PM
To: Ostendorf, Jody <ostendorf.jody@epa.gov>

Subject: Re: question

So according to our records, 2,299 are on state lands - for shutins and producing wells, just of note 9,087 on reservation/indian lands. Let us know if need anything else! Sheila On Wed, Aug 3, 2016 at 10:47 AM, Ostendorf, Jody < ostendorf.jody@epa.gov > wrote: Hi Sheila, We wanted to know how many oil and gas sources are on state land. The comment reads, "Reviewer recommends EPA provide the number of sources/sites that fall under UDEQ's jurisdiction. As stated elsewhere in the preamble, there are significant more sources outside of UDEQ's jurisdiction and, thus, using a much smaller set of sources may not be appropriate for comparison." Thanks, Jody Jody Ostendorf State Implementation Plan Program Manager Uinta Basin Project Coordinator Air Quality Planning Unit (8P-AR) U.S. Environmental Protection Agency, Region 8 1595 Wynkoop Street Denver, CO 80202-1129

303.312.7814

From: Sheila Vance [mailto:svance@utah.gov]
Sent: Wednesday, August 03, 2016 10:00 AM
To: Ostendorf, Jody <ostendorf.jody@epa.gov>

Subject: question

So I was getting the info you were asking for to help respond to comments and just want to make sure we get your the right information. You wanted to know how many oil and gas sources are on state land and federal lands? Do you want current, today numbers? And just use Uintah and Duchesne counties as the boundaries? Thanks!

Sheila

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## **Sheila Vance | Environmental Scientist**

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